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April 16, 2021

**VIA ECF**

Honorable Kevin N. Fox  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMORANDUM ENDORSEMENT**

Re: *Onate v. AHRC Healthcare, Inc.*  
Case No.: 1:20-cv-08292

Dear Judge Fox:

We represent the Plaintiff in connection with the above-referenced action and write jointly with counsel for Defendant AHRC Healthcare, Inc. Specifically, the parties write to jointly request an extension of the current deadline to complete fact discovery from April 16, 2021 to August 13, 2021. While the parties have endeavored to complete all fact discovery within the time provided in the Civil Case Management Plan and Scheduling Order dated December 17, 2020 (Dkt. No. 28), the parties' discovery disputes, which were most recently heard and resolved by Your Honor on April 14, 2021, delayed the completion of fact discovery. Accordingly, the parties respectfully request that the deadline to complete fact discovery be extended by 119 days to August 13, 2021. This is the first request for this relief.

We thank the Court in advance for its time and consideration.

Sincerely,

/s/ Jason S. Giaimo  
Jason S. Giaimo

cc: Defendant's counsel (via ECF)

4/16/21

Application granted. A telephonic status conference will be held with the parties on July 7, 2021, at 11:00 a. m. The parties shall use dial-in number (888) 557-8511 and access code 4862532.  
SO ORDERED:

*Kevin Nathaniel Fox*

Kevin Nathaniel Fox, U.S.M.J.